

**pIN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

**DONNA CURLING, ET AL.,
Plaintiffs,**

v.

**BRAD RAFFENSPERGER, ET AL.,
Defendants.**

**DECLARATION OF DONNA A.
CURLING IN SUPPORT OF
CURLING PLAINTIFFS'
MOTION FOR PRELIMINARY
INJUNCTION**

Civil Action No. 1:17-CV-2989-AT

DONNA A. CURLING, declares, under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. My name is Donna A. Curling. I am an elector of the State of Georgia and a resident of Fulton County. I have personal knowledge of the facts in this declaration and, if called to testify as a witness, I would testify under oath to these facts.

2. I hereby incorporate my previous declarations as filed in this case as if fully restated verbatim herein.

3. I am currently registered to vote in Roswell, Georgia.

4. I intend to vote in all future elections for which I am eligible—including in the March 24, 2020 presidential preference primary and in additional elections taking place in 2020.

5. As the legislative liaison for Georgians for Verified Voting (“GAVV”), I am active in voter protection activities and have become familiar with Georgia’s current and proposed election systems, including the election system proposed by Dominion Voting Systems, Inc. (“Dominion”) and selected by the Georgia Secretary of State’s office (the “Proposed Election System”).

6. If Georgia conducts future elections on the Proposed Election System, I will be forced to vote on a system that I do not believe will count my vote equally and fully, or to jump through additional bureaucratic hoops to vote using an absentee paper ballot, including requesting an absentee ballot by mail. I have described the onerous burdens and risks of voting using a paper absentee ballot by mail in my previous declarations.

7. Nevertheless, given what I have learned in my work with GAVV and through discovery in this lawsuit, I intend to attempt (again) to vote absentee using a paper ballot in future elections. Until Georgia replaces the unverifiable voting machines used in the Proposed Election System, I will not cast my vote on those

machines, as I have no confidence that they will accurately record, transmit, and count my vote.

8. Were the Court to order that Georgia cannot implement and use the Proposed Election System, but must instead use hand-marked paper ballots, which a voter can review to verify that her votes are cast as intended and will be counted as cast, I would perceive less risk in casting my ballot in-person.

I declare under penalty of the perjury laws of the State of Georgia and the United States that the foregoing is true and correct and that this declaration was executed this 4th day of October, 2019, in Roswell, Georgia.


DONNA A. CURLING